

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DR. BRIMA SYLLA, CONNOR SPENCE,
DAVID-DESYRÉE SHERWOOD,
KATHLEEN COLE, SULTANA HOSSAIN,
TRISTIAN MARTINEZ, JUSTINE
MEDINA, BRETT DANIELS, RUEL
MOHAN, ROB MCDONALD, PASQUALE
CIOFFI, SAM BOWMAN, JOE
LUCCHESI, ROBERT PECORARO,
YACKISHA NEBOT-LOPEZ, AIDE
ESTUDILLO, BRIANA ANDERSON,
NAQUASIA ROWLAND, TAMIA
CAMPBELL, JENNIFER SCHOFIELD,
MICHAEL RIVERA, CHRISTIAN
MOHANSINGH, JAMES BARDO,
ABDULA DIALLO, IBRAHIM BALDE,
FELICIA REESE, IGOR MABIKA,
MICHAEL LOPEZ, NICHOLAS
FERRUGIARO, ABDULLAH SESAY,
KAREEM LINDSAY, LILLIAN LOPEZ,
TREMAYNE YOUNGBLOOD, ALI GIGNI,
MANNY THOMPSON, RJEEN
RODRIGUEZ, SIMONE SUE, LATIFAH X,
COMRAD BROWN, JORDAN SILVEIRA,
RICHARD COTTO, DEYANIRIS MOTE,
JESSICA EDMONDS, KIMBERLY
MERISE, BIANCA BUTLER, MICHAEL
ANTONIO, MARK JOHNSON, CRAIG
AYALA, JOHN PHILIP, LASALLE DELLA
ROCA, CHRIS KOKO, CHRISTINA
JIMMY, CHARLES JOHNSON, CHRIS
PHILIP, AHMED BOBACAR, CATY
RIDREGO, DURVIS SAINT LUIS, KEVIN
BERTMAN, AALIYA DIAMOND,
MOHAMED AWES, ALI DAWUD, FRED
FIBIO, ISMAEL MENDOZA, BRIANA
PACHECO, JAYSHAWN BAZEMORE,
AMANI CLAUDIA, CHRISTOPHER
WHRIGHT, EZEKIEO BENSON, ETHAN
COPER, JOSEPH DEJESUS, ISOLA
OKUNU, ARIANA JOHNSON, MOSTEP
STEP, ABAYOMI "BAYOU" ABIMBOLA,
GABRIEL WEBBS, ALIYYAN AZIZ,

Civil Case No. 23-5261 (AMD)(TAM)

EMMANUEL JEAN, ANTOINETTE
GRAY, DON ELIJAH, ERIC HARRIS,
RONDU JOHN, NICOLE FLORES,
MERLDON GUSTAVE, MOHAMED
GACK, JOE JOHNSON, and ADRIAN
JOHN,

Plaintiffs,

-against-

AMAZON LABOR UNION, and CHRIS
SMALLS, as President of the Amazon Labor
Union,

Defendants.

**NON-PARTIES RAYMOND ROACH AND AMAZON.COM SERVICES
LLC'S MOTION TO QUASH AND FOR A PROTECTIVE ORDER**

PLEASE TAKE NOTICE THAT, pursuant to Federal Rule of Civil Procedure 45 and the Court's April 25, 2024 Minute Order, the Declaration of Patrick L. Robson, with exhibits, and the accompanying memorandum of law in support, Non-Parties Raymond Roach and Amazon.com Services LLC hereby move to quash, and pursuant to Federal Rule of Civil Procedure 26 move for a protective order with respect to a subpoena ("Subpoena") seeking the production of documents in New York, New York in the above-captioned action. As discussed further in the attached memorandum of law in support of this motion, the Subpoena should be quashed, and a protective order should be entered because the Subpoena seeks discovery that is not "necessary," is not relevant to resolve the issues in the litigation, and constitutes an undue burden.

April 30, 2024

Respectfully submitted,

/s/ Patrick L. Robson

Patrick L. Robson

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Amazon.com Services LLC*

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of April, 2024, I electronically filed the foregoing document with the United States District Court for the Eastern District of New York through the Court's CM/ECF system, which sent notification of such filing to the attorneys of record.

/s/ Patrick L. Robson
Patrick L. Robson